

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:)
) Case No. 15-20659-svk
EINELDA SANTIAGO,) Chapter 13
)
Debtor.)

OBJECTION TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Please take notice that the debtor, Einelda Santiago, by her attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, hereby objects to the Motion to Relief from the Automatic Stay as brought by creditor.

The debtor asserts that the boiler in her home needed to be replaced and due to the unexpected expenses of replacing it she was not able to make her mortgage payment.

The debtor shall resume making regular monthly mortgage payments, beginning with the payment due for the month of January. The debtor requests that any and all remaining arrearages be paid through the plan as a supplemental claim.

Debtors attorney drafted this objection prior to the deadline and mailed a copy of it to the attorney for Landmark Credit Union, but neglected to finish filing the document in CM/ECF. Landmark Credit Unions's attorney's notified debtors attorney's of this oversight, and have been in contact regarding a settlement of this Motion for Relief.

The debtor respectfully requests that the Court schedule a hearing on the matter.

Dated: December 11, 2015.

DeLadurantey Law Office, LLC
Attorneys for Debtor

/s/
By: Nathan E. DeLadurantey
State Bar No. 1063937

Drafted by:
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CERTIFICATE OF SERVICE

Matthew Hoenig states under oath that he is over the age of 18 and a attorney at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on December 11, 2015, he delivered true and correct copies of the attached "Objection to Motion for Relief from the Automatic Stay" and "Certificate of Service" via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court
Eastern District of Wisconsin
via CM/ECF

Trustee Mary B. Grossman
via CM/ECF

Office of the United States Trustee
via CM/ECF

Mark C. Darnieder
Darnieder & Sosnay
735 N Water St., Suite 930
Milwaukee, WI 53202
Via First Class Mail

I certify under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2015.

Signed: /s/ Matthew Hoenig
Matthew Hoenig

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